

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:18-CR-575
	§	(HUGHES)
JACK STEPHEN PURSLEY, AKA STEVE PURSLEY	§	FILED UNDER SEAL
	§	

**DECLARATION IN SUPPORT OF GOVERNMENT’S MOTION FOR COSTS OF
PROSECUTION**

GRACE E. ALBINSON, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury, to the best of her information and belief:

1. I am a Trial Attorney in the Southern Criminal Enforcement Section of the Tax Division, United States Department of Justice, and I submit this Declaration in support of the accompanying Government’s Motion for Costs of Prosecution.

2. All items and costs listed in the accompanying Bill of Costs (Attachment B) are true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 13, 2020.

/s/ Grace E. Albinson

Grace E. Albinson
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Exhibit B**United States v. Jack Stephen Pursley
Criminal No. 4:18-CR-575****Bill of Costs****I. Fees for Printed Transcripts**

Grand Jury Transcripts – \$1,152.60
 Trial Transcripts (rough daily) – \$1,300.80

Total Transcript Fees – \$2,453.40

II. Fees for Witnesses and Witness Travel Expenses

Name	Witness Fees	Transportation	Hotel	Per Diem	Taxi/ Mileage	Misc.¹	Total
Robert Armor	\$80.00	\$812.24	\$140.40	\$61.00	\$188.47	\$56.00	\$1338.11
Thomas Foster	\$160.00				\$ 85.64	\$30.00	\$275.64
Jon Hurt	\$ 80.00		\$255.06	\$ 61.00	\$255.20		\$651.26
Shaun Mooney	\$ 80.00				\$14.16	\$24.00	\$ 118.16
Stephen Mooney	\$160.00	\$ 510.23		\$183.00	\$106.02	\$60.00	\$1019.25
Eduard Venerabile	\$200.00	\$1704.62	\$705.70	\$274.50			\$2884.82
Total	\$760.00	\$3027.09	\$1101.16	\$579.50	\$649.49	\$170.00	<u>\$6287.24</u>

III. Fees for Exemplification and Costs of Making Copies

Exhibit Binders for Trial – **\$7,126** (50% of total cost)

IV. Other Costs**Rule 15 Deposition – Kerry Smith (two-day deposition)**

Court Reporter Appearance Fee - \$600
 Videographer Appearance Fee - \$2,850
 Video file creation - \$210
 Video file synchronization - \$665
 Original Transcript - \$1590
 Inclusion of Exhibits - \$82

¹ Comprises baggage fees and parking.

Certified Copy Transcript - \$346

Travel expenses for court reporter and videographer - \$2500

Total - \$8,843

Total Costs - \$24,709.64